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more easily create professional-looking documents, most non-professionals find these computer programs overly complex and difficult to use. That is, although the computers sitting on the desks of such non-professionals are sufficiently powerful to handle such tasks, the users themselves may not be sufficiently knowledgeable to perform them. Furthermore, even for experienced professionals, the prepress process is fraught with uncertainty; for example, the professional must know the type of paper and ink output that is desired a priori before translating an electronic version of a document into a format from which paper and ink copies can be printed. That is, even for experienced professionals, the prepress process is not tightly integrated enough to attain fast, easy and cost-effective print publishing.

SUMMARY OF APPLICANT'S EMBODIMENTS

The above-identified shortcomings as well as other shortcomings and problems are addressed by the applicant's embodiments. For example, in one embodiment, a computerized prepress system includes three components: a server, a client and a printer. The server has stored thereon an authoring program to create a document, and a translation program to translate the document to a suitable prepress format. The client downloads the authoring program from the server to create the document, and then uploads the document to the server for translation to the suitable prepress format. The printer receives the document as translated to the suitable prepress format from the server, such that the printer may then print copies of the document.

More specifically, in one particular embodiment of the invention, the authoring program is written in the programming language Java, and the client, server and printer are each connected to an intranet the Internet. Thus, a user at the client needs only to run a web browser program, such as Netscape Navigator, to access the server and download and run the authoring program. Once the user has created a document with the authoring program, it is saved at the server. The server may then as required translate the document into a suitable prepress format -- such as PostScript -- and send it to the printer (e.g., as a MIME-compliant electronic mail) for printing. These embodiments and others provide the basis for the pending claims, but it is noted that such claims are not limited in scope specifically to these embodiments.

ADVANTAGES

The embodiments of the invention described above thus provides for several advantages. The user at the client does not need to know anything about the prepress format required by the

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printer. Since the server stores the authoring program that is then downloaded to the client for creation of a document, the server can maintain the authoring program such that it knows both the format to which the authoring program saves the document, and the format to which the document must be translated for printing at the printer. Furthermore, the authoring program stored at the server may be as simple as necessary for novice users to comfortably use, or as powerful as necessary for experienced users to use. The professional user benefits from the tight integration of the invention, in that the professional user need only be concerned with creating the document, and not the manner by which the document will ultimately be printed with paper and ink, which may already be preselected within the server.

OVERVIEW OF ARGUMENTS

As noted above, it is clear that the examiner expended considerable effort and thought in formulating the various rejections. It is also clear, however, from what is clearly a "best shot" at the claims as filed, that the art is devoid of any teaching of the problem addressed by the applicant's invention, and is further even more devoid of any teaching or suggestion of the solution provided by the applicant's invention. With all due respect, the references cited against the application simply miss the mark by a wide margin. And again, with all due respect, after all is said and done, it is clear that there is no evidence to support the position that the applicant's invention, in any of its various forms, is "obvious" in view of the teachings of the art. Instead, the prior art without exception is tangential at best in relevance. At the end of the day, the invention stands out from the cited art as a clearly unique and nonobvious solution to a well known problem. In fact, it can be fairly said that the applicant's invention is pioneering in the manner it addresses the above-noted problems. The applicant's specific comments regarding the art are set forth below.

§103 Rejection of the Claims

Claims 1-7 were rejected under 35 USC § 103(a) as being unpatentable over Davis et al. (U.S. Patent No. 5,796,952).1) The applicant notes that the Davis patent has nothing to do with printing pre-press or printing in general. Rather, it appears that this is a process for a server to download customized forms and to track customer utilization times of that form, and placing that

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information into a database which can be utilized for marketing and placement of specific banner images or other images. While such activities may be similar in a very vague sense as far as a client-server architecture is concerned, Davis et al. does not in the least acknowledge or address the problem solved by the system set forth in claims 1-7. That is, as noted above, this invention avoids the problem of a user having to know about prepress formats for the printer. In particular, since the server stores the authoring program that is then downloaded to the client for creation of a document, the server can maintain the authoring program such that it knows both the format to which the authoring program saves the document, and the format to which the document must be translated for printing at the printer. Furthermore, the authoring program stored at the server may be as simple as necessary for novice users to comfortably use, or as powerful as necessary for experienced users to use. The professional user benefits from the tight integration of the invention, in that the professional user need only be concerned with creating the document, and not the manner by which the document will ultimately be printed with paper and ink, which may already be preselected within the server. Davis et al. has no recognition of this problem or the solution afforded by the invention of claims 1-7. The advantageous attributes of this system are clearly set out in claims 1-7, which call for downloading an authoring program from the server, uploading the document from the client to the server, and then creating a prepress format that can be sent to the printer. Therefore, it is respectfully requested that claims 1-7 are patentable over the Davis et al. reference.

Claims 8-17, all dependent on claim 1, were rejected under 35 USC § 103(a) as being unpatentable over Cannon et al. (U.S. Patent No. 5,751,590). The Cannon et al. patent regards how a non-Internet software program is utilized to rapidly create greeting cards, not involving a client-server relationship. Rather, it appears to be software installed on hardware to allow rapid set up of cards to output most likely to an inkjet printer. Cannon et al. also, therefore, is devoid of any teaching regarding the problem addressed, or the solution afforded by, the present invention. Accordingly, the rejection of claims 8-17 is respectfully traversed. If it was the intention of the examiner to apply a combination rejection of Davis et al. With Cannon et al. as to these claims, it is further pointed out that even in combination these patents do not recognize or even hint at the problem addressed by the invention, nor give any inkling as to how it would be solved as

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provided by the invention of claim 8-17.

Claims 18-33 were rejected under 35 USC § 103(a) as being unpatentable over Amstein et al. (U.S. Patent No. 5,793,966). Again, it is noted that Amstein et al. has nothing to do with the printing process or desktop publishing applications. While generically it may be old to download a program to a client, and communicate with the server, Amstein et al. again says nothing about the problem or solution addressed by claims 18-33. In particular, there is no mention of the printing process or desktop publishing applications. On-line desktop publishing and pre-press preparation are simply irrelevant to the Amstein filing. No teachings are found in this reference for downloading an authoring program which results ultimately in an upload of a document to be translated to a pre-press format. Accordingly, this rejection is respectfully traversed.

Claims 34-44 were rejected under 35 USC § 103(a) as being unpatentable over Bates et al. (U.S. Patent No. 5,751,590). It is noted again that Bates et al. has to do with "window navigation technology", as opposed to the problem solution addressed by the present invention. Again, no mention or hint of the problem is presented, nor any mention or hint of the solution. Accordingly, the system of downloading the authoring program and uploading a document that is translated to a suitable prepress format, as set forth in claims 34-44, is not taught by Bates et al., and, accordingly, the rejection is traversed.

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CONCLUSION

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney at (612) 373-6902 to facilitate prosecution of this application.
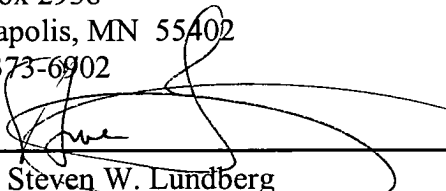
Respectfully submitted,

STEVEN JECHA ET AL.

By their Representatives,

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Date _____ By _____
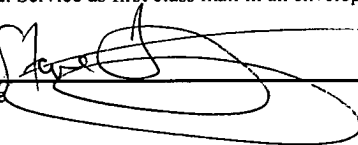   Steven W. Lundberg
                                          Reg. No. 30,568

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to Assistant Commissioner of Patents, Washington, D.C. 20231 on **November ___, 1999.**

_____
Name

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Signature